

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Civil Action No. 02-cv-2741

LYNX ASSOCIATES, INC.

Plaintiff

v.

ASG CONSULTANTS LTD.

Defendant

JURY TRIAL DEMANDED


RULE 16 MEMORANDUM

The parties in the above captioned action, by their attorneys, hereby submit to the Court their Joint Rule 16 Memorandum as ordered by the Court in its amended Scheduling Order dated August 20, 2002.

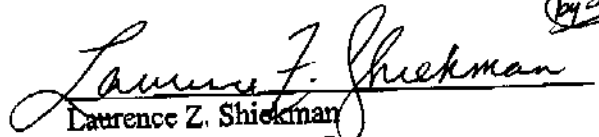

1. The parties propose the following schedule for remaining pre-trial proceedings setting forth the time limits:
- (a) One month to join other parties and to amend the pleadings;
 - (b) The parties do not contemplate filing non-dispositive motions. In the event that Motions in Limine are to be filed, the parties suggest that they be filed at the time when dispositive motions may be filed;
 - (c) The parties suggest that six (6) months be allowed to complete discovery;
 - (d) The parties suggest that seven (7) months be allowed to file pretrial memoranda pursuant to Federal Rule of civil Procedure 26(a)(3) and Local Rule of Civil Procedure 16.1(c);
 - (e) The parties suggest that seven (7) months be allowed to exchange exhibits;
 - (f) The parties suggest that seven (7) months be allowed to exchange experts' reports; and
 - (g) The parties suggest that eight (8) months be allowed to be permitted to file dispositive motions.

2.
 - (a) The parties feel that the prospects of amicable settlement are good, although certainly not assured;
 - (b) The parties are in the process of consulting with their clients regarding agreement to refer this case to U.S. Magistrate Judge Jacob P. Hart for trial and will advise the Court as soon as they have an answer;
 - (c) It is estimated that the trial will last two (2) days;
 - (d) This Court's jurisdiction is based on diversity of citizenship, the fact that plaintiff sold defendant's products within this judicial district and the fact that both parties conduct a substantial volume of business in this judicial district;
 - (e) In view of the fact that this case involves breach of contract and is not particularly complex, the parties do not feel that there are any other matters that may facilitate the just, speedy and inexpensive disposition of this case.
3. The parties, by their attorneys, Mitchell A. Kramer for plaintiff and Laurence Z. Shiekman, for defendant, hereby certify that they have conferred upon each of the above matters and approve the contents of this Rule 16 Memorandum.

Respectfully submitted,



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